

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In re: )  
 )  
Catherine Courts Condominium, ) Case No. 19-29822  
LLC, et al. ) (Jointly Administered)  
 )  
Debtor. ) Chapter 11  
 )  
 ) Honorable Timothy A. Barnes

FINDINGS OF FACT AND CONCLUSIONS OF LAW IN SUPPORT OF ORDER AWARDING  
TO GOLDSTEIN & MCCLINTOCK LLLP, COUNSEL TO THE DEBTOR, FOR ALLOWANCE  
AND PAYMENT OF INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES

TOTAL FEES REQUESTED:	\$ 71,360.00	TOTAL COSTS REQUESTED:	\$ 744.72
TOTAL FEES REDUCED:	\$ 0.00	TOTAL COSTS REDUCED:	\$ 71.14
TOTAL FEES ALLOWED:	\$ 71,360.00	TOTAL COSTS ALLOWED:	\$ 673.58

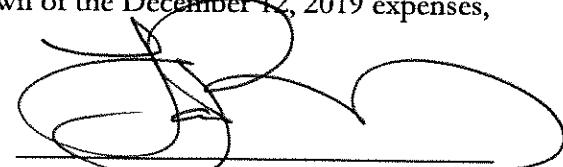
TOTAL FEES AND COSTS ALLOWED: \$ 72,033.58

The attached time and expense entries have been underlined to reflect disallowance in whole or in part. The basis for each disallowance is reflected by numerical notations that appear on the right of each underlined entry. The numerical notations correspond to the enumerated paragraphs below.

(1) Meal Expenses – TOTAL of disallowed amounts: \$ 71.14

The Court denies the allowance of reimbursement of this meal expense. *In re Covent Guardian Corp.*, 103 B.R. 937, 942 (Bankr. N.D. Ill. 1989) (Sonderby, J.) (“[I]t is highly unlikely that counsel could prove that the meal expenses were reasonably necessary for the proper representation of the debtor . . . If the attorney were not working on the case, he would still have to eat. Accordingly, the Court finds that, except in very limited circumstances, local meals are not reasonably necessary for the proper representation of the client.”). The attached expense entries contain charges for meals on November 12, 2019, in the amount of \$49.92, and on December 12, 2019, the latter being lumped with a separate, allowable expense incurred on the same date, for a total amount of \$42.44. In the absence of further information regarding the breakdown of the December 12, 2019 expenses, the court has disallowed half of those expenses, *viz.*, \$21.22.

Dated: February 11, 2020



Timothy A. Barnes  
United States Bankruptcy Judge

# EXHIBIT A

## Goldstein & McClintock LLLP

## INVOICE

111 W. Washington St., Ste. 1221  
Chicago, Illinois 60602  
United States

Invoice # 10223  
Date: 01/21/2020  
Due On: 02/05/2020

Catherine Courts Condominium, LLC and Catherine Courts Management, Inc.

### Case Administration

Attorney	Date	Description	Quantity	Rate	Total
Amrit Kapai	10/22/2019	Phone call with UST office regarding status and background (.2). Determine relevant post-petition filing deadlines (.7). Review correspondence from UST regarding initial debtor interview and 341 meeting (.2) and prepare client for upcoming obligations (.5).	1.60	\$385.00	\$616.00
Amrit Kapai	10/28/2019	Revise creditor matrix based on additional documentation from client (1.0). Review insurance-related documents from Parkway Bank, including association declarations (.8).	1.80	\$385.00	\$693.00
Teresa Gomez	10/29/2019	Update creditor matrix and upload same via cm/ecf	1.10	\$235.00	\$258.50
Teresa Gomez	10/29/2019	Prepare and file appearances via cm/ecf	0.30	\$235.00	\$70.50
Amrit Kapai	10/29/2019	Review media from client regarding damaged units.	0.20	\$385.00	\$77.00
Amrit Kapai	10/31/2019	Prepare for initial debtor interview (1.3). Attend initial debtor interview with client (1.1).	2.40	\$385.00	\$924.00
Amrit Kapai	11/05/2019	Email correspondence with association's counsel following inspection (.2). Phone call with company principals to discuss issue with pest control and cash collateral use (.2).	0.40	\$385.00	\$154.00
Amrit Kapai	11/06/2019	Review and consider email correspondence to and from client's principals regarding case admin and open tasks (.5). Follow up email correspondence with client's principals regarding same (.2). Address client inquiries regarding vendor payments (.2). Draft status update to client's principals following meeting with association's counsel (1.1).	2.00	\$385.00	\$770.00
Teresa Gomez	11/07/2019	Update creditor matrix	0.30	\$235.00	\$70.50
Amrit Kapai	11/14/2019	Review and respond to email inquiries from company principals concerning open case	0.50	\$385.00	\$192.50

		issues.				
Amrit Kapai	12/02/2019	Review second interim cash collateral order (.3). Strategy conference with MEM to discuss strategy and next steps (.8).	1.10	\$385.00	\$423.50	
Matthew McClintock	12/02/2019	Strategy conference with Amrit Kapai to discuss going forward tasks (0.8, none of time billed as a courtesy)	0.80	\$0.00	\$0.00	
Amrit Kapai	12/12/2019	Conference call with client to discuss next steps.	0.40	\$385.00	\$154.00	
Amrit Kapai	12/17/2019	Draft status update to client (.4). Email correspondence with client regarding special assessment notice (.2). Related phone call with bank's counsel and Matt McClintock (.2). Strategy conference with Matt McClintock to discuss open assignment and going forward strategy (.6).	1.40	\$385.00	\$539.00	
Matthew McClintock	12/17/2019	Strategy conference with Amrit Kapai to discuss cash collateral, repair, claim investigation, and other open case issues (0.6 hours, none of time billed as a courtesy)	0.60	\$0.00	\$0.00	
Matthew McClintock	12/18/2019	Consider and address issue related to parking stickers / cash collateral use	0.20	\$495.00	\$99.00	
Amrit Kapai	12/18/2019	Prepare for and attend hearing on OCP motion and Rule 2004 Motion (2.0).	2.00	\$385.00	\$770.00	
Matthew McClintock	12/19/2019	Review request from lender (re: sweeping funds early) and correspondence to Amrit Kapai to re: same and related budget issue to address	0.10	\$495.00	\$49.50	

Time Keeper	Quantity	Rate	Total
Amrit Kapai	13.8	\$385.00	\$5,313.00
Matthew McClintock	0.3	\$495.00	\$148.50
Matthew McClintock	1.4	\$0.00	\$0.00
Teresa Gomez	1.7	\$235.00	\$399.50
	<b>Subtotal</b>		<b>\$5,861.00</b>

## First Day and Business Pleadings

Attorney	Date	Description	Quantity	Rate	Total
Matthew McClintock	10/21/2019	Review and revise first day declaration (1.2);	3.20	\$495.00	\$1,584.00

<p>respond to inquiry from client re: cash collateral budget (0.2); call with client and Amrit Kapai (for part) re: budget and other issues (1.0); follow-up on issues from call, including strategy conference with Ashley Brandt and Amrit Kapai concerning prosecution of claims against condo association (0.6); follow-up correspondence to clients re: budget and cash collateral issues (0.2)</p>						
Amrit Kapai	10/21/2019	Update client's principals regarding filing issues (.2). Preliminary research related to cash collateral issues (1.8). Revise first day declarations (1.9). Revise joint administration motion (.5). Conference call with client to discuss CC budget (.4). Review same (.4).	5.20	\$385.00	\$2,002.00	
Matthew McClintock	10/22/2019	Continue to draft interim cash collateral order	2.40	\$495.00	\$1,188.00	
Amrit Kapai	10/22/2019	Further revise first day declarations (1.5); Review revised cash collateral budget (.4)	1.90	\$385.00	\$731.50	
Amrit Kapai	10/23/2019	Confer with Matt McClintock and Ashley Brandt to discuss cash collateral budget and motion (.3). Review payoff quote from bank's counsel (.2). Multiple correspondence with Matt McClintock to discuss cash collateral motion and budget (.7). Review and revise motion to extend time to file schedules and other information (.7).	1.90	\$385.00	\$731.50	
Matthew McClintock	10/23/2019	Multiple strategy conferences with Amrit Kapai concerning cash collateral issues and other issues for finalizing first day pleadings (0.8 hours, none of time billed as a courtesy)	0.80	\$0.00	\$0.00	
Amrit Kapai	10/24/2019	Review, revise and finalize first day declarations and motions (4.2). Coordinate filing and service (1.0). Research issues related to cash collateral motion (1.4). Multiple phone calls and email correspondence with client to discuss revisions to first day declarations (.6).	7.20	\$385.00	\$2,772.00	
Amrit Kapai	10/28/2019	Multiple email correspondence regarding cash collateral negotiations (.4). Review additional documents from client regarding status of outstanding invoices (.8). Phone call with client to discuss bank's concerns with CC budget (.3). Address issues related to cash collateral motion (1.5).	3.00	\$385.00	\$1,155.00	
Jason Ben	10/29/2019	Call with M. McClintock and A. Kapai regarding Cash Collateral issues.	0.40	\$525.00	\$210.00	
Jason Ben	10/29/2019	Strategy conference w. A. Kapai regarding	0.20	\$525.00	\$105.00	

cash collateral issues.						
Jason Ben	10/29/2019	Call with M. McClintock regarding First Day Hearing.	0.10	\$525.00	\$52.50	
Jason Ben	10/29/2019	Review materials to prepare for First Day Hearing.	2.50	\$525.00	\$1,312.50	
Amrit Kapai	10/29/2019	Multiple email correspondence and phone calls with Matt McClintock and bank's counsel regarding interim cash collateral use (.5). Prepare interim CC budget (.8). Phone call with Association's counsel to discuss cash collateral motion (and related preparation) (.7).	2.00	\$385.00	\$770.00	
Amrit Kapai	10/29/2019	Draft motion to pay pre-petition utility claims.	1.80	\$385.00	\$693.00	
Matthew McClintock	10/29/2019	Calls with Jason Ben and Amrit Kapai to discuss Bank's refusal to consent to cash use and associated issues; additional call with Amrit Kapai and bank counsel in effort to negotiate consensual order; consider issues for contested hearing (1.5 hours, none of time billed as a courtesy)	1.50	\$0.00	\$0.00	
Jason Ben	10/30/2019	Review case law for prep First Day hearing (.8); draft, review and revise presentation to Court (1.8)	2.60	\$525.00	\$1,365.00	
Jason Ben	10/30/2019	Prepare for meeting with the client (.2); meet with client (.4).	0.60	\$525.00	\$315.00	
Jason Ben	10/30/2019	Conference with lender and association's counsel in advance of hearing.	0.20	\$525.00	\$105.00	
Jason Ben	10/30/2019	Attend First Day Hearing.	0.70	\$525.00	\$367.50	
Jason Ben	10/30/2019	Follow-up meeting with client regarding result of hearing and go-forward issues.	0.40	\$525.00	\$210.00	
Jason Ben	10/30/2019	Discuss go forward strategy with A. Kapai regarding edits to Agreed Order and case.	0.40	\$525.00	\$210.00	
Amrit Kapai	10/30/2019	Prepare for (2.9) and attend first day hearing (.7). Revise proposed orders for joint admin motion and motion to extend time to file schedules/SOFA and submit to chambers (1.0). Revise interim cash collateral budget and send to client with follow up questions (.7). Multiple email correspondence regarding same (.2).	5.50	\$385.00	\$2,117.50	
Amrit Kapai	10/31/2019	Multiple email correspondence with bank's counsel regarding interim cash collateral order (.3). Review related documents from bank's counsel (.3). Finalize interim cash collateral budget and circulate to parties (.5).	3.30	\$385.00	\$1,270.50	

Continue drafting utility motion and related research (2.2).					
Amrit Kapai	11/01/2019	Finalize interim cash collateral order and circulate to parties (.3). Multiple email correspondence and phone calls with parties in interest regarding same (.2).	0.50	\$385.00	\$192.50
Amrit Kapai	11/01/2019	Research relating to payment of de minimis pre-petition utility payments.	0.30	\$385.00	\$115.50
Amrit Kapai	11/06/2019	Phone call with client regarding cash collateral use (.2). Follow up phone call with bank (.1).	0.30	\$385.00	\$115.50
Amrit Kapai	11/08/2019	Prepare second interim cash collateral budget and related call with client.	0.60	\$385.00	\$231.00
Amrit Kapai	11/08/2019	Draft cash management motion and research of issues related to same.	2.80	\$385.00	\$1,078.00
Amrit Kapai	11/11/2019	Review and revise motion to use existing cash management system.	0.50	\$385.00	\$192.50
Amrit Kapai	11/12/2019	Revise cash management motion.	2.00	\$385.00	\$770.00
Amrit Kapai	11/15/2019	Review Debtor's October operating expenses (.4). Review and finalize second interim budget and circulate to bank's counsel (.5).	0.90	\$385.00	\$346.50
Amrit Kapai	11/18/2019	Multiple email correspondence to address issues with vendor invoice payment.	0.80	\$385.00	\$308.00
Matthew McClintock	11/19/2019	Strategy conference with Amrit Kapai concerning issues for tomorrow's hearing (cash collateral, cash management, and retention)	0.20	\$495.00	\$99.00
Amrit Kapai	11/19/2019	Draft second interim cash collateral order (.5). Multiple email correspondence with MEM re same (.3). Phone call with bank's counsel regarding same (.4). Discuss related strategy issues with MEM (.2).	1.40	\$385.00	\$539.00
Matthew McClintock	11/20/2019	Prepare for (including revising order) contested cash collateral hearing (0.9); attend same, including meetings with parties before and after (1.3); draft revised cash collateral order after hearing and circulate to creditors for approval along with redline (0.5); post-hearing strategy conferences with Ashley Brandt and Amrit Kapai (0.4); call with counsel to Association concerning minimizing litigation costs (0.2); coordinate submission of agreed order to court (including email and hard copy correspondence to comply with court's	3.90	\$495.00	\$1,930.50

procedures) (0.6)						
Amrit Kapai	11/20/2019	Strategy conference with Matt McClintock and Ashley Brandt to discuss outcome of cash collateral hearing.	0.20	\$385.00	\$77.00	
Ashley Brandt	11/20/2019	Conference with Matt McClintock to discuss cash collateral hearing (.2 hours, time not billed as courtesy).	0.20	\$0.00	\$0.00	
Matthew McClintock	11/21/2019	Call with bank counsel to discuss settlement of cash collateral dispute	0.20	\$495.00	\$99.00	
Amrit Kapai	12/03/2019	Draft final cash collateral order.	1.80	\$385.00	\$693.00	
Matthew McClintock	12/04/2019	Review and revise draft of proposed final cash collateral order received from Amrit Kapai (0.5), strategy conference with Amrit Kapai to discuss budget issues (0.2); respond to correspondence from bank re: assessment / budget issue (0.1)	0.80	\$495.00	\$396.00	
Amrit Kapai	12/04/2019	Review and finalize final cash collateral order (1.0). Prepare final cash collateral budget (including (0.2) conference with MEM to discuss related issues) (.8). Related email correspondence with bank's counsel (.2).	2.00	\$385.00	\$770.00	
Amrit Kapai	12/05/2019	Multiple email correspondence with bank's counsel and client regarding proposed final cash collateral order + budget (including protocol for remitting AP payments) (.8). Related correspondence with MEM regarding same (.3).	1.10	\$385.00	\$423.50	
Amrit Kapai	12/06/2019	Draft motion to approve interim compensation procedures.	1.10	\$385.00	\$423.50	
Amrit Kapai	12/09/2019	Begin drafting ordinary course professional retention motion.	0.80	\$385.00	\$308.00	
Amrit Kapai	12/10/2019	Continue drafting OCP motion.	1.90	\$385.00	\$731.50	
Amrit Kapai	12/12/2019	Review and finalize OCP motion and coordinate filing and service (.5). Prepare form Rule 2014 statement (.3).	0.80	\$385.00	\$308.00	

Time Keeper	Quantity	Rate	Total
Jason Ben	8.1	\$525.00	\$4,252.50
Ashley Brandt	0.2	\$0.00	\$0.00
Amrit Kapai	51.6	\$385.00	\$19,866.00
Matthew McClintock	10.7	\$495.00	\$5,296.50

Matthew McClintock	2.3	\$0.00	\$0.00
	<b>Subtotal</b>	<b>\$29,415.00</b>	

## Schedules and Statements

Attorney	Date	Description	Quantity	Rate	Total
Eric Garavaglia	10/23/2019	Draft motion to extend deadline to file schedules/SOFA (with accompanying proposed order)	1.30	\$295.00	\$383.50
Amrit Kapai	11/01/2019	Prepare schedules/SOFA information request and related cover email to client.	1.10	\$385.00	\$423.50
Amrit Kapai	11/07/2019	Preliminary review of information from client relating to SOFA.	1.00	\$385.00	\$385.00
Amrit Kapai	11/11/2019	Work on preparation of schedules/SOFA (2.0). Related email correspondence with client (.2).	2.20	\$385.00	\$847.00
Teresa Gomez	11/12/2019	Work on schedules and SOFA	2.10	\$235.00	\$493.50
Amrit Kapai	11/12/2019	Continue work on schedules/statement of financial affairs.	4.10	\$385.00	\$1,578.50
Teresa Gomez	11/13/2019	Work on finalizing and filing schedules and statement of financial affairs	2.90	\$235.00	\$681.50
Matthew McClintock	11/13/2019	Telephone strategy conferences with Amrit Kapai to address questions and discuss issues relating to finalizing schedules and statements	0.50	\$495.00	\$247.50
Amrit Kapai	11/13/2019	Phone call and email correspondence with client regarding follow up documents for schedules/SOFA (.3). Review and revise same (4.1). Related phone call with MEM (.5).	4.90	\$385.00	\$1,886.50
Amrit Kapai	11/15/2019	Prepare schedules/SOFA for CCM and coordinate filing.	0.50	\$385.00	\$192.50
Teresa Gomez	11/15/2019	Work on Catherine Courts Management Schedules and Statement of Financial Affairs	0.90	\$235.00	\$211.50
Amrit Kapai	12/11/2019	Draft email correspondence to client regarding preparation of MOR (.8). Address related issues (.4).	1.20	\$385.00	\$462.00
Amrit Kapai	12/18/2019	Prepare Oct/Nov MOR and review documents from client relating to same.	2.30	\$385.00	\$885.50
Amrit Kapai	12/19/2019	Continue preparing October/November MOR	1.40	\$385.00	\$539.00

and transmit to client for review (1.1). Phone call and email correspondence with client regarding same (.3).

Amrit Kapai 12/23/2019 Address issues related to October/November MOR. 0.70 \$385.00 \$269.50

Time Keeper	Quantity	Rate	Total
Eric Garavaglia	1.3	\$295.00	\$383.50
Amrit Kapai	19.4	\$385.00	\$7,469.00
Matthew McClintock	0.5	\$495.00	\$247.50
Teresa Gomez	5.9	\$235.00	\$1,386.50
		<b>Subtotal</b>	<b>\$9,486.50</b>

## Employment and Fee Applications

Attorney	Date	Description	Quantity	Rate	Total
Amrit Kapai	10/30/2019	Draft G&M retention application and related documents.	2.50	\$385.00	\$962.50
Amrit Kapai	10/31/2019	Continue drafting declaration in connection with retention application.	0.50	\$385.00	\$192.50
Matthew McClintock	11/04/2019	Review and revise declaration in support of G&M's retention application (0.6)	0.60	\$495.00	\$297.00
Matthew McClintock	11/05/2019	Review and revise declaration in support of retention application	0.40	\$495.00	\$198.00
Amrit Kapai	11/07/2019	Revise G&M retention application and declaration.	1.90	\$385.00	\$731.50
Amrit Kapai	11/08/2019	Finalize G&M retention application and coordinate filing and service (.7). Draft proposed order (.4).	1.10	\$385.00	\$423.50

Time Keeper	Quantity	Rate	Total
Amrit Kapai	6.0	\$385.00	\$2,310.00
Matthew McClintock	1.0	\$495.00	\$495.00
		<b>Subtotal</b>	<b>\$2,805.00</b>

## Executory Contracts and Leases

Attorney	Date	Description	Quantity	Rate	Total
Matthew McClintock	11/07/2019	Respond to Amrit Kapai concerning lease issue	0.10	\$495.00	\$49.50
Amrit Kapai	11/07/2019	Research regarding notice and assumption/assignment issues for tenant leases.	1.80	\$385.00	\$693.00

Time Keeper	Quantity	Rate	Total
Amrit Kapai	1.8	\$385.00	\$693.00
Matthew McClintock	0.1	\$495.00	\$49.50
<b>Subtotal</b>			<b>\$742.50</b>

## Claims Analysis and Recovery

Attorney	Date	Description	Quantity	Rate	Total
Ashley Brandt	10/28/2019	Review and analyze declaration and issues related to bylaws and initiate preparing requests for documentation from association and requests regarding use and payment of insurance proceeds.	0.70	\$425.00	\$297.50
Ashley Brandt	11/06/2019	Review and analyze issues related to potential claims against association.	0.30	\$425.00	\$127.50
Amrit Kapai	11/12/2019	Draft follow up email correspondence to Association regarding document request, inquiries from prior meeting, and other open issues.	0.70	\$385.00	\$269.50
Matthew McClintock	11/15/2019	Correspondence with association counsel to obtain documents	0.10	\$495.00	\$49.50
Ashley Brandt	12/03/2019	Review and analyze issues related to by laws and declaration and matters related to voting and right to vote regarding same (.6); review issues related to claims for failure to repair damaged units with insurance proceeds (.6); review issues related to upcoming meeting of condominium association (.4).	1.60	\$425.00	\$680.00
Amrit Kapai	12/03/2019	Prepare for (.8) and participate in strategy conferences with MEM and AWB to discuss claims against third party and potential adversary filings (.5).	1.30	\$385.00	\$500.50

Matthew McClintock	12/03/2019	Conference with Ashley Brandt and Amrit Kapai regarding potential basis for adversary proceedings (not billed as courtesy).	0.50	\$0.00	\$0.00
Ashley Brandt	12/03/2019	Office conference with Amrit Kapai and Matt McClintock to discuss adversary proceeding against potential third party (not billed as courtesy).	0.50	\$0.00	\$0.00
Matthew McClintock	12/09/2019	Follow-up with Amrit Kapai concerning addressing Association's failure to produce requested documents (needed for evaluating claims and addressing repair issues)	0.20	\$495.00	\$99.00
Matthew McClintock	12/18/2019	Strategy conference with Amrit Kapai to discuss hearing outcome and strategy issues in light of same (0.4 hours, not billed as a courtesy).	0.40	\$0.00	\$0.00
Amrit Kapai	12/18/2019	Conference with MEM to discuss results of hearing and next steps.	0.40	\$385.00	\$154.00

Time Keeper	Quantity	Rate	Total
Ashley Brandt	2.6	\$425.00	\$1,105.00
Ashley Brandt	0.5	\$0.00	\$0.00
Amrit Kapai	2.4	\$385.00	\$924.00
Matthew McClintock	0.3	\$495.00	\$148.50
Matthew McClintock	0.9	\$0.00	\$0.00
		<b>Subtotal</b>	<b>\$2,177.50</b>

## Meetings and Communications with Creditors

Attorney	Date	Description	Quantity	Rate	Total
Matthew McClintock	10/24/2019	Multiple correspondence with bank counsel re: adequate protection and cash collateral use (0.4); associated correspondence with client and co-counsel re: strategy for same (0.3)	0.70	\$495.00	\$346.50
Ashley Brandt	10/28/2019	Review and analyze issues related to proposed plan and conference with attorney for lender regarding same.	0.60	\$425.00	\$255.00
Amrit Kapai	11/01/2019	Review email correspondence from various parties in interest regarding status and open issues (.3). Phone call with party in state court litigation regarding bankruptcy status	0.50	\$385.00	\$192.50

(.2).

Amrit Kapai	11/04/2019	Participate in bank's inspection of damaged condo units (3.0). Related phone call with Matt McClintock to discuss same (.3).	3.30	\$385.00	\$1,270.50
Matthew McClintock	11/05/2019	Call with Amrit Kapai and bank counsel to discuss open issues (0.4 hours, not billed as a courtesy).	0.40	\$0.00	\$0.00
Amrit Kapai	11/05/2019	Conference call with MEM and bank counsel (for part) to discuss status and open assignments.	0.40	\$385.00	\$154.00
Amrit Kapai	11/05/2019	Prepare for meeting with Association's counsel including reviewing condo declaration.	0.40	\$385.00	\$154.00
Matthew McClintock	11/06/2019	Respond to inquiry from bank counsel re: tax escrow payment	0.10	\$495.00	\$49.50
Matthew McClintock	11/06/2019	Meeting with counsel to Condo Association and Amrit Kapai to discuss insurance and repair issues for fire-damaged units and also back and forth claims allegedly held by association and Debtor (and how such claims might be resolved while minimizing legal expense)	1.50	\$495.00	\$742.50
Amrit Kapai	11/06/2019	Revise chart of potential claims against the Association (.3). Prepare for (.7) and attend meeting with Association's counsel (1.5).	2.50	\$385.00	\$962.50
Amrit Kapai	11/06/2019	Draft response to bank's information information/document request.	1.10	\$385.00	\$423.50
Matthew McClintock	11/07/2019	Email correspondence with bank counsel and Amrit Kapai concerning issues for upcoming cash collateral budget (0.2); call with same to discuss (0.3); additional (subsequent) call to discuss related but different issues (payments and whether they should clear, etc.) (0.2)	0.70	\$495.00	\$346.50
Amrit Kapai	11/07/2019	Multiple email correspondence with bank and MEM regarding second interim cash collateral budget (.2). Conference with MEM to discuss same (.1). Follow up phone call with the bank to discuss payment of expenses and related email correspondence with client (.4).	0.70	\$385.00	\$269.50
Matthew McClintock	11/13/2019	Reply to inquiry from bank counsel	0.10	\$495.00	\$49.50
Matthew McClintock	11/14/2019	Respond to inquiry from bank counsel about payment of tax escrows	0.10	\$495.00	\$49.50
Amrit Kapai	11/15/2019	Email correspondence with Association's	0.20	\$385.00	\$77.00

counsel regarding status of document request and other open issues.					
Matthew McClintock	11/19/2019	Multiple correspondence with Bank, Association, and Amrit Kapai concerning cash collateral order, progress on repairs, and other issues	0.20	\$495.00	\$99.00
Amrit Kapai	11/20/2019	Prepare for and attend 341 meeting.	2.00	\$385.00	\$770.00
Matthew McClintock	11/21/2019	Multiple correspondence with counsel to bank concerning possible settlement of cash collateral issues and, subsequently, concerning exchange of documents for hearing (0.3); consider issues and possible means of resolving (0.2)	0.50	\$495.00	\$247.50
Amrit Kapai	12/02/2019	Review and respond to various business inquiries ( 6). Draft email to bank's counsel regarding final CC order (2). Draft email to Association regarding document requests (.2).	1.00	\$385.00	\$385.00
Amrit Kapai	12/06/2019	Draft response to inquiry of Cook County Tax Assessor (.7). Related email correspondence with client (.2).	0.90	\$385.00	\$346.50
Amrit Kapai	12/26/2019	Prepare for and participate in teleconference with bank's counsel regarding status.	0.50	\$385.00	\$192.50

Time Keeper	Quantity	Rate	Total
Ashley Brandt	0.6	\$425.00	\$255.00
Amrit Kapai	13.5	\$385.00	\$5,197.50
Matthew McClintock	3.9	\$495.00	\$1,930.50
Matthew McClintock	0.4	\$0.00	\$0.00
	<b>Subtotal</b>		<b>\$7,383.00</b>

## Avoidance Actions and Litigation

Attorney	Date	Description	Quantity	Rate	Total
Amrit Kapai	10/21/2019	Prepare for and attend state court eviction status hearing (1.3). Related follow up emails regarding results (0.2).	1.50	\$385.00	\$577.50
Ashley Brandt	10/23/2019	Review and analyze issues related to upcoming court hearing and motions to dismiss and notice of bankruptcy and prepare for same (.7); attend court ordered	2.70	\$425.00	\$1,147.50

		status and hearing on motions and on suggestion of bankruptcy and confirmation of stay (1.8); review correspondence and communicate with opposing counsel regarding issues related to hearing and cases (.2).				
Amrit Kapai	10/23/2019	Research regarding potential estate claims (2.3). Draft summary of findings (.8).	3.10	\$385.00	\$1,193.50	
Amrit Kapai	10/23/2019	Assist with preparation for state court status hearing (0.8). Phone call with attorney for discovery respondents regarding bankruptcy stay (0.2). Confer with Ashley Brandt regarding same (0.3).	1.30	\$385.00	\$500.50	
Amrit Kapai	10/29/2019	Prepare for and attend status hearing in eviction matter (1.2).	1.20	\$385.00	\$462.00	
Ashley Brandt	10/31/2019	Prepare for and attend extended hearing regarding state court fraud action.	2.20	\$425.00	\$935.00	
Matthew McClintock	11/04/2019	Call with Amrit Kapai concerning results of inspection of units and preparations for meeting with Condo Association	0.30	\$495.00	\$148.50	
Amrit Kapai	11/05/2019	Draft summary of potential estate claims.	1.80	\$385.00	\$693.00	
Matthew McClintock	11/06/2019	Correspondence with Ashley Brandt, Amrit Kapai, and Debtor's principals concerning meeting with condo association and strategy with respect to resolving (or if needed asserting) Debtor's claims against same	0.30	\$495.00	\$148.50	
Amrit Kapai	12/04/2019	Preliminary research in connection with estate claims.	2.20	\$385.00	\$847.00	
Amrit Kapai	12/05/2019	Continue preparing adversary proceeding with respect to voting rights (3.7). Related strategy conference with A. Brandt including phone call with client (1.0).	4.70	\$385.00	\$1,809.50	
Ashley Brandt	12/05/2019	Conference with Amrit Kapai and related phone call with client regarding Debtor's rights and claims (unbilled as courtesy to client)	1.00	\$0.00	\$0.00	
Amrit Kapai	12/11/2019	Prepare email correspondence to MEM to discuss litigation strategy against association (.2). Begin drafting 2004 motion (2.9).	3.10	\$385.00	\$1,193.50	
Matthew McClintock	12/12/2019	Review and revise Rule 2004 motion and addendum (document request) aimed at getting information from Condo Association (necessitated by Association's failure to voluntarily produce same on a timely basis)	3.70	\$495.00	\$1,831.50	
Amrit Kapai	12/12/2019	Further revisions to Rule 2004 motion, and	3.00	\$385.00	\$1,155.00	

coordinate filing and service.

Amrit Kapai	12/13/2019	Revise and finalize 2004 motion exhibits and proposed order.	1.80	\$385.00	\$693.00
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Time Keeper	Quantity	Rate	Total
Ashley Brandt	4.9	\$425.00	\$2,082.50
Ashley Brandt	1.0	\$0.00	\$0.00
Amrit Kapai	23.7	\$385.00	\$9,124.50
Matthew McClintock	4.3	\$495.00	\$2,128.50
		<b>Subtotal</b>	<b>\$13,335.50</b>

## Asset Sales

Attorney	Date	Description	Quantity	Rate	Total
Amrit Kapai	12/17/2019	Review potential sale inquiry and related email correspondence with MEM.	0.40	\$385.00	\$154.00

Time Keeper	Quantity	Rate	Total
Amrit Kapai	0.4	\$385.00	\$154.00
		<b>Subtotal</b>	<b>\$154.00</b>

## Expenses

Type	Date	Description	Quantity	Rate	Total
Expense	10/20/2019	Uber home from office after filing.	1.00	\$16.08	\$16.08
Expense	11/04/2019	Transportation to and from client site for inspection.	1.00	\$45.68	\$45.68
Expense	11/12/2019	Late work meal (for two professionals) to complete Schedules/SOFA.	1.00	\$49.92	\$49.92
Expense	11/12/2019	Late work car from office to home to complete Schedules/SOFA.	1.00	\$11.65	\$11.65
Expense	11/30/2019	Copy charges for the month of October 2019 (billed at actual cost of \$0.10 per page)	1.00	\$300.50	\$300.50
Expense	11/30/2019	Postage charges for the month of October 2019 (billed at actual cost)	1.00	\$91.05	\$91.05

Expense	12/12/2019	<u>Late work meal ( for one professional ) and uber home to complete time-sensitive case filings.</u>	1.00	\$42.44	\$42.44	(1)
Expense	12/31/2019	Copy charges for the month of November 2019 (billed at actual cost of \$0.10 per page)	1.00	\$186.40	\$186.40	
Expense	12/31/2019	Postage charges for the month of November 2019 (billed at actual cost)	1.00	\$1.00	\$1.00	

Time Keeper	Quantity	Rate	Total
			<b>Subtotal</b> <b>\$744.72</b>

**Subtotal** **\$72,104.72**  
**Total** **\$72,104.72**

Please make all amounts payable to: Goldstein & McClintock LLLP

Please pay within 15 days.